

JOHN W. HUBER, United States Attorney (#7226)  
J. DREW YEATES, Assistant United States Attorney (#9811)  
MICHAEL J. THORPE, Assistant United States Attorney (#11992)  
BRYAN N. REEVES, Assistant United States Attorney (#DC 994799)  
Attorneys for the United States of America  
111 Main Street, Ste. 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682

---

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACKSON STUART TAMOWSKI  
PATTON,

Defendant.

**FELONY**  
**COMPLAINT**

VIOLATION: 2:20mj416-DBP

Count 1: 18 U.S.C. § 844(i), Arson in  
Interstate Commerce

Chief Magistrate Judge Dustin B. Pead

---

Before the Honorable Dustin B. Pead, United States Chief Magistrate Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT 1**

18 U.S.C. § 844(i)

[Arson in Interstate Commerce]

On or about May 30, 2020, in the District of Utah,

JACKSON STUART TAMOWSKI PATTON,

Defendant herein, maliciously damaged and destroyed, and attempted to maliciously damage and destroy, by means of fire and explosives, a vehicle, to wit: a Salt Lake City Police Department patrol car, used in interstate commerce and in activities affecting interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 844(i) and 2.

**AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT**

Complainant, JEFFREY T. WRIGHT, being duly sworn, hereby states:

1. I, Jeffrey T. Wright, am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation, and have been employed in that capacity for approximately 12 years. I am currently assigned to the Salt Lake City Division of the FBI and have primary investigative responsibility for federal crimes related to national security and domestic terrorism. I gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. I have been trained to investigate federal crimes and have investigated an array of complex federal crimes.
2. The statements in this affidavit are based, in part, on information provided by law enforcement officers, other investigators with knowledge of this investigation, and witnesses who observed the incident, as well as information obtained from the State of Utah. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint I have not included every fact known to me concerning this investigation. Rather, I have set forth only the facts necessary to establish probable

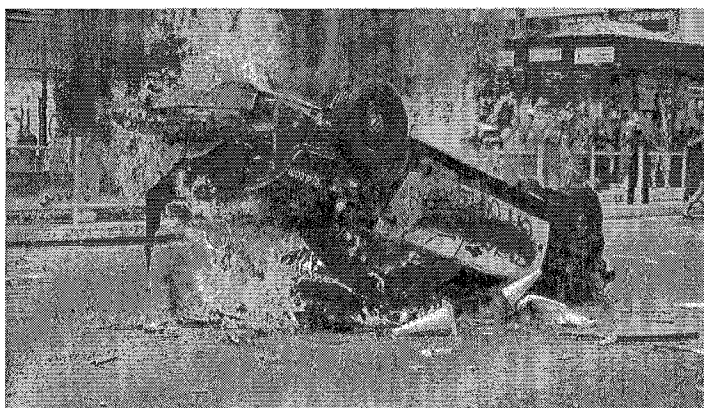
cause for the complaint.

#### **Statement of Probable Cause**

3. On May 30, 2020, protestors took to the streets of Salt Lake City, Utah, to call for justice after the killing of George Floyd on May 25, 2020 in Minneapolis, Minnesota. Similar protests occurred in other cities across the United States in the days following May 25, 2020. Some of the protests devolved into vandalism, property damage, arson and other riotous acts.
4. On May 30, 2020, protestors assembled on the streets of downtown Salt Lake City. Some of the protestors were non-residents of Utah.
5. The downtown area of Salt Lake City, Utah hosts myriad companies, commercial properties, retail establishments, restaurants, gas stations, public facilities and other businesses that were open for business on May 30, 2020, during the time of the protest.
6. During the protest, Salt Lake City Police Officers and other law enforcement personnel were deployed throughout the downtown area to protect individuals, businesses, and property. Police officers used law enforcement vehicles throughout the protest to transport law enforcement personnel, to provide emergency aid and assistance, and to serve as a resource for crowd control measures.
7. The Salt Lake City Police Department regularly conducts business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the Salt Lake City Police Department in

enforcing laws also affect interstate commerce.

8. On the afternoon of May 30, 2020, the peaceful protest in downtown Salt Lake City devolved into acts of destruction and violence. Rioters near the Salt Lake City library at 200 East 400 South overturned a Salt Lake City Police Department patrol car. Moments later rioters set the patrol car ablaze.
9. Video footage of the riot displays rioters standing on top of the overturned patrol car. Video footage also shows individual rioters using fire and explosives to damage and destroy the patrol car.
10. The patrol car was engulfed in flames, as shown in the photograph below:



11. The patrol car was completely destroyed, as shown in the photograph below:



12. On May 31, 2020, ATF Special Agent Certified Fire Investigator Candidate Tyler Olson and Salt Lake City Fire Investigators examined the destroyed patrol car. The patrol car is a Chevrolet Impala. From the physical examination of the vehicle, and video and photographic evidence, it is SA Olson's opinion that the destruction of the patrol car was incendiary in nature.
13. A review of video footage from May 30, 2020, shows multiple individuals standing at a distance around the overturned Salt Lake City Police Department patrol car. One individual is observed on the south side of the patrol car bending at the waist reaching into the vehicle with his right arm near what appears to be a small flame. The individual walks away from the patrol car for a few seconds then returns to the patrol car. The individual then appears to be throwing an unknown substance from what appears to be a canister into the patrol car causing the flames to increase. This individual is described as Caucasian wearing black pants, a black tee shirt with light colored font saying "Free Throw" on the back.
14. Footage also shows this same individual wearing a black hat with lettering reading "SALT LAKE" and black cloth covering the individual's nose and mouth. Video shows this individual having three distinctive tattoos on the back-right arm above the elbow. The tattoo closest to the elbow is described as a heart with teary eyes. The tattoo above is described as a diamond and above that is a tattoo that says "801". See photo below:





15. On June 2, 2020 during a demonstration, law enforcement officers with Salt Lake City Police Department located the individual based on the tattoos described above. The individual was arrested by Salt Lake City Police Department and was identified as Jackson Stuart Tamowski PATTON.

16. Based on the foregoing information, I respectfully request an arrest warrant be issued for Jackson Stuart Tamowski PATTON for a violation of 18 U.S.C. § 844(i).

I swear that this information is true and correct to the best of my knowledge, information, and belief.

DATED this 3 day of June 2020.

/s/ Jeffrey T. Wright  
JEFFREY T. WRIGHT  
FBI Special Agent

Approved as to form:

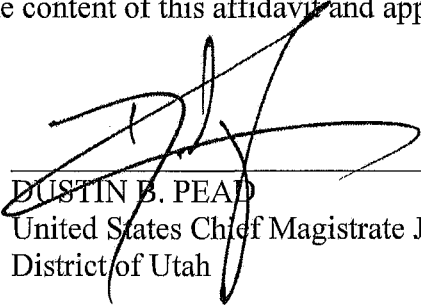
JOHN W. HUBER  
United States Attorney

JONATHAN YEATES Digitally signed by JONATHAN YEATES  
Date: 2020.06.03 08:22:11 -06'00'

J. DREW YEATES  
Assistant United States Attorney

The affiant appeared before me by telephonic conference on this date pursuant to Fed.

R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.

  
DUSTIN B. PEAD  
United States Chief Magistrate Judge  
District of Utah